

# Safeguarding & Child Protection Policy 2023-24

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**Signed:**



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# 1. Policy Overview

This policy should be read within the context of the Safeguarding Strategy and alongside the Child and Vulnerable Adult Protection Policy and Procedures.

NextStep Training Ltd recognises that the welfare of children, young people and vulnerable adults is paramount and we take our responsibility to safeguard and promote the welfare of all our Apprentices and members of staff seriously. The staffs working in the company have a legal duty of care towards the children, young people and vulnerable adults attending. This duty brings with it the responsibility to ensure that all efforts are made to safeguard children, young people and vulnerable adults from suspected and actual harm. Children and staff attending the training centre have a right to feel safe. In partnership with parents and carers, and business partners the training centre has a responsibility to act promptly on any concerns they may have regarding a child's, young person's or vulnerable adult's welfare and well-being.

The Safeguarding of staff, Apprentices and apprentices at NextStep Training is deemed to be the responsibility of all staff at NextStep Training and Safeguarding along with the associated elements of Child Protection and the Prevent agenda are integral to all activities associated with NextStep Training whether on or off site.

Aspects included under the 'umbrella' of Safeguarding and for which NextStep Training has a responsibility in supporting all Apprentices, apprentices, and employees include:

- Copies of the policies and procedures should be available to all Apprentices, parents, careers, employees or any other member linked with the services in NextStep.
- Main policies, which include safeguarding, must be explain to Apprentices and employees making sure they are aware of the procedures related to the child protection, young adults and vulnerable people, according the DfE, OFSTED and others local authority regulator.
- The policy must be supported with monitored actions by the Designated Safeguarding Lead.
- The result of monitoring and supervising, will give chance to update or adjust the current policy in collaboration of DSL and senior members team.
- The policy must stablish actions and practices to promote safe environment for Apprentices and employees inside the NextStep structure, and within the outside job-working environments for the Apprentices.
- DSL have a delegate responsibility to make sure that relevant procedures are know by all members, and guarantee they will be capable to identify risk and breach in the practices, and also bring any concern for her/him attention.

NextStep Training Ltd ensures that adheres to its legal obligation and social responsibilities in relation to safeguarding children, young people and vulnerable adults. This is in accordance with the below legislation:

- The Children's Act 2014
- The Protection of Children Act 1999
- The Counter-Terrorism and Security Act 2015
- The Sexual Offences Act 2003
- The Education Act 2002
- The Safeguarding Vulnerable Groups Act 2006, and reviews carried out in 2008, and in practice and policy directed by the Government's publication, Every Child Matters – Change for Children.
- The Protection of Freedoms Act 2012
- Keeping Children Safe in Education 2022
- FGM Act 2003

NextStep Training Ltd will offer training to the Apprentices and employees to guarantee they are aware of the updates in KCSIE 2023, Part One and Annex B outlines abuse and safeguarding issues that we all need to be aware of. The categories have been identified in Appendix 1 of NextStep Training’s Child and Vulnerable Adult Protection Policy and Procedure policy. In addition to these you must be aware of how to identify the signs of the abuse categories outlined in KCSiE and how to respond to and report them. NextStep Training has raised awareness of the government Run, Hide, Tell campaign to further promote how to keep yourself safe within and outside training and work environments.

**NextStep Training makes sure that Apprentices and employees have clear understanding of delicate and important definitions and term linked with the promotion of safeguarding practices, such:**

- 1.
2. **Safeguarding** – is a term which is broader than ‘child protection’ and relates to the action taken to promote the welfare of children and young people and protect them from risks and harm. Safeguarding is everyone’s responsibility.
3. **Children and Young People** – Throughout the document, references are made to ‘children and young people’. These terms are interchangeable and refer to children who have not yet reached 18 or vulnerable adults.
4. **Staff** – includes any adult who is employed, commissioned or contracted to work with children or young people, including volunteers and guest speakers in either a paid or unpaid capacity.
5. **Designated Safeguarding Lead** – a senior member of staff with overall responsibility for children and young people protection within NextStep Training Ltd.
6. **Duty of Care** – the duty which rests upon an individual and organisation to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible.
7. **External Agencies** – including Children’s Services, Independent Safeguarding Authority, Hackney Safeguarding Board, Police etc.
8. **External Contractors** – includes building or maintenance contractors who are required to work at NextStep Training Ltd for a given period of time.
9. **Vulnerable Adult** - someone aged 18 or over: who is, or may be, in need of community services due to age, illness or a mental or physical disability, who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.

**To support staff, Apprentices and apprentices to keep themselves:**

- Healthy (including wellbeing, mindfulness, nutrition, activity and exercise)
- Safe (Health & Safety, Critical Incident)
- Online-Safety (Internet, text, websites, safe from cyber bullying, grooming and radicalisation)

**To ensure that staff and Apprentices/apprentices:**

- Feel safe whilst undertaking training activities during visits at NextStep Training Ltd building.
- Know how to identify and report instances of neglect, Physical, emotional, sexual abuse, or any other behaviour linked with bullying, harassment, radicalisation, FGM, etc.

**Local Authority Contact Details:**

### **Local Children's Services MASH Hackney**

Contact Name (if applicable):

Contact Number: 020 8356 5500

E-mail: [MASH@hackney.gov.uk](mailto:MASH@hackney.gov.uk)

Out of Hours Contact Number: 0208 356 2710

Website:

<https://hackney.gov.uk/child-protection>

### **Local Authority Designated Officer (LADO)**

E-mail: [lado@hackney.gov.uk](mailto:lado@hackney.gov.uk)

Contact Name (if applicable): Liezel Le Roux

E-mail: [liezel.leroux@hackney.gov.uk](mailto:liezel.leroux@hackney.gov.uk)

Contact Number: 0208 356 4569

Out of Hours Contact Number (if applicable):

### **Channel Panel (Prevent Duty):**

### **SO15 Local Operations officers (Prevent)**

Contact Name (if applicable):

Contact Number: 020 7275 4652

E-mail: [SO15Mailbox-.LocalOpsNorthEastTeam3@met.police.uk](mailto:SO15Mailbox-.LocalOpsNorthEastTeam3@met.police.uk)

Out of Hours Contact Number (if applicable): 911

### **Hackney Prevent Co-ordinator**

Contact Name: Tracey Thomas

Contact Number: 0208 356 8104

E-mail: [Tracey.Thomas@Hackney.gov.uk](mailto:Tracey.Thomas@Hackney.gov.uk)

### **Prevent Team**

E-mail: [prevent@hackney.gov.uk](mailto:prevent@hackney.gov.uk)

## **2. Personnel Responsible for Safeguarding**

### **NextStep Training Ltd Designed Safeguarding Lead (DSL)**

Contact Name: Vanessa Pinzon Torrado  
Contact Number: 020 7247 5497  
E-mail: [vanessa@nextsteptrainingltd.co.uk](mailto:vanessa@nextsteptrainingltd.co.uk)  
Out of Hours Contact Number (if applicable):

### **Deputy Designed Safeguarding Lead (DDSL)**

Contact Name: Anna Kirpichnikova  
Contact Number: 020 7247 5497  
E-mail: [anna@nextsteptrainingltd.co.uk](mailto:anna@nextsteptrainingltd.co.uk)

### **Safeguarding Officer**

Contact Name: Zak Vesamia  
Contact Number: 07830 071 960  
E-mail: [ahmed@nextsteptrainingltd.co.uk](mailto:ahmed@nextsteptrainingltd.co.uk)

### **Safer Recruitment**

Contact Name: Agnes Karamagi  
Contact Number: 020 7247 5497  
E-mail: [harpreet@NextSteptrainingltd.co.uk](mailto:harpreet@NextSteptrainingltd.co.uk)

Keeping Children Safe in Education (KCSiE) September 2023 has informed this policy. All staff must read Part One and Annex B as a minimum.

Annex B contains additional information about specific forms of abuse and safeguarding issues. This has been listed in Appendix One of this policy.

### **Designated Safeguarding Lead (DSL) –**

Please also refer to the Designated Safeguarding Lead Role Analysis. NextStep Training Ltd has a Designated Safeguarding Lead, who is a senior member of staff, responsible of coordinate safeguarding and child protection practices and procedures to early identification of risk, issues or breach within the company.

During the Designated Safeguarding Lead's absence, another suitably trained Safeguarding Lead (normally the Deputy Safeguarding Lead or member of the senior management team) will take the role responsibilities.

A remote DSL, who must be available and easily contactable, can be nominated in exceptional circumstances and this must be approved by the Managing Director.

The Designated Safeguarding Lead must have in house training and retake every 2 years prior to the expiry date. The company expectation is that the Designated Safeguarding Lead must also have Local Authority specific DSL training, which must also be taken every 2 years. The Designated Safeguarding Lead must complete Prevent Duty, Child Sexual Exploitation and FGM online training as listed in the Company Learning and Development Directory and must

retake every 2 years. E-safety must be retaken annually in line with “Keeping Children safe in education” guidance.

This ensures regular opportunities for discussing best practice, sharing learning, updates, legislation and questioning knowledge as a team. The company library of safeguarding staff meeting training packages must be used to embed the staff team’s knowledge and understanding.

The Designated Safeguarding Lead is responsible for liaising with, and reporting to, external professionals and organisations such Children’s services, LADO, police officer, Channel, and others and for making referrals as and when required.

The Designated Safeguarding Lead must remain informed and up to date with local practice and policies and inform all staff of relevant changes immediately.

**DSL is required to ensure that they are familiar with NextStep Training policies and procedures related to Safeguarding including:**

- Refer to the Safeguarding Strategy for the safeguarding and associated policies.
- Assessor/Tutors and Manager are responsible for knowing their Apprentices and apprentices and to identify if they are at risk with particular reference to the NextStep Training Safeguarding Policy. Training will support the following responsibilities:
  - ✓ Apprentices and apprentices at risk of not completing their course are deemed to be ‘at risk’ – Tutors, must identify the reason as physical, emotional, financial, or other that could refer a reason for the dropping out of their course or not succeeding.
  - ✓ Assessor/Tutors should ensure that all staff teaching or in contact with ‘at risk’ Apprentices e.g. Specialist Skills Tutors or Recruitment are informed of the needs of the apprentice or apprentice and appropriate strategies for managing those Apprentices to maximise their opportunity for success.
  - ✓ Where staff are not clear of strategies for managing ‘at risk” Apprentices or apprentices it is their responsibility to seek support and to undertake appropriate training to address their skills need through the continuous development programme or by reporting the training need to their line manager.

**All Staff Responsibilities**

All staff, regardless of role, have a duty of care, which ensure the well-being and safety of children, young adult and vulnerable adults in the company, and must be aware of their safeguarding responsibilities.

All staff understand the procedures of the Safeguarding Policy and Child Protection, for be able to report any concern to the DSL accurately.

All staff have a responsibility to remain up to date with safeguarding information, legislation and procedures, and must attend staff meeting training as determined by the Manager or Designated Safeguarding Lead.

All staff working with children and young adults must have sufficient understanding and use of English to ensure the well-being of children, young adults and vulnerable adults in their care. For example:

- Keep records in English
- Liaise with other agencies in English
- Summon emergency help
- Understand instructions

### **Training Responsibilities**

All staff must complete the online L2 Safeguarding Children module and re-take every 2 years. New employees must take the module within 2 weeks of commencing employment as part of their induction programme. They must also be issued with the company safeguarding card. Induction training must include:

- Safeguarding and Child Protection procedures
- Prevent Duty
- Female Genital Mutilation
- Whistleblowing
- E-safety
- Health and Safety Essentials

**Staff must have effective quarterly be reviewed, and get the appraisal twice a year which provide opportunities to:**

- Discuss any issues – particularly concerning children’s and young people development or well-being
- Identify solutions to address issues as they arise, including their own well-being
- Receive coaching to improve personal effectiveness

**Other training will include:**

- DSL and SO training refreshed every two years, all to attend annual updates
- Managers and HR responsible for interviewing to attend Safer Recruitment training very three years
- Annual Governor update and awareness training.



### 3. Pastoral Responsibility

All staff are responsible for ensuring the safety and well-being of all Apprentices and apprentices and other colleagues. However, Assessor/Tutors have a specific responsibility for the safeguarding of Apprentices and apprentices within their cohort group. In line with their job role, they must ensure that:

**They know their Apprentices and apprentices through:**

- Following Safeguarding practices, tutor and teachers, will learn about the background of the Apprentices and apprentices. Being aware as more possible of the family dynamic, social, financial and job stages, also social groups, location and other environments in which Apprentices could be involved. Tutors and teachers will must be able to identify early any risk or hazards within the external factors.
- Application procedure, recruitment and enrolment documentation
- Understanding of initial assessment.
- Recognising behaviour and individual character traits
- Identifying any signal or symptom of risk or hazard in the apprentice's development, such (change's behaviours, poor attendance, mood changes, continuous sickness period, lack of commitment, lack of input with task and assessments)
- Tutors and teachers, must to be able to coach their Apprentices, offering support and extending help whenever it be necessary and possible. Keep the Apprentices motivated during the learning process. However, when their expertise will not raise the goals, tutors and teachers will report to DSL and hold meeting to discuss Apprentices track development.

**They ensure that the following is in place in response to the above:**

- Completed ILP and past history as appropriate for the individual
- Sharing of information as appropriate between colleagues to get a complete 'picture' of the apprentice or apprentice's life
- Meeting is held with Apprentices or apprentices to establish reasons behind behaviour changes and any absences or times when they have gone missing from training or work
- Individual risk assessments as appropriate
- Recommendation for change of course if appropriate
- Additional Learning Support and EHCP information.

**They ensure that Apprentices and apprentices are fully supported by:**

- Informing all Assessor/Tutors of support needs
- Ensuring that support mechanisms are effectively supporting individuals to overcome barriers
- Inform relevant parties where they are less effective e.g. external organisations and support groups, parents/guardians, ALS team
- Using one to one tutorial effectively to support achievement on course and overcome barriers to learning

## **Apprentice and apprentice induction**

All Apprentices and apprentices must have Safeguarding included in their Induction Programme and be made aware of:

- NextStep Training policies related to safeguarding
- Their responsibility for their own and others' safety
- How to report any instances related to Safeguarding, Child Protection or radicalisation or contact with extremist groups.

## **4. Information Sharing, Data Protection and GDPR in Respect of Children, Young People and Vulnerable Adults and Staff**

Next Steps Training LTD is a provider that holds training using online website and platforms for students in different standards . For what take all the necessary steps to guarantee the use, manipulation, record and keep procedures meet the GDPR Act 2018.

Apprentices and employees of Next, has access to an individual policy for Data protection, which states the following requirements:

- 1. Key principles**
- 2. Personal Data**
- 3. Data collection, use, retention, protection, sharing, transfers, keeping.**
- 4. Preventing, identifying, reporting and recording breaches and security measure**
- 5. Sharing personal data procedures and third parties**
- 6. Law enforcement requests and disclosures**
- 7. Data protection officer, roles and responsibilities**
- 8. Data protection rights and GDPR and related legislation and documents**
- 9. Emails and software procedures**

Designated Safeguarding Lead and Data Protection Officer work together to train, support and guarantee Apprentices and employees has clear understanding of the procedures relating with all above and also any situation that could be related with an issue, risk or breach in the above.

NextStep make sure the partnership with Local authority is developed following the procedure regarding sharing information to third parties.

NextStep will record and keep information of Apprentices, employees, volunteer and any other member linked with its services, following the times and terms described in the policy.

## **5. Curriculum Responsibilities**

### **Employer**

All places of employment must complete the health and safety checklist with the Training Advisor to ensure that the safety of Apprentices, apprentices and NextStep Training staff is maintained. Apprentices and employers must be familiar with the requirements of safeguarding and health and safety within the workplace.

All employers are issued with guidance on Safeguarding, Child Protection, Prevent, British Values and Equality, Diversity and Inclusion in order to ensure that NextStep Training maintains its commitment to safeguarding Apprentices and apprentices when engaged in training related activities. The guidance outlines what is meant by Safeguarding and Equality, Diversity and Inclusion and the safeguarding measures that should be put in place and who to contact at NextStep Training regarding safeguarding, Child Protection or radicalisation concerns or questions.

## **6. Safe Recruitment, Induction, Training and Reviewing**

NextStep Training has clear procedures which must be followed by manager employing staff, during the stages of Recruitment, Induction, Training, and monitoring process.

These are outlined in the Safer Recruitment Policy and comply with the safeguarding statutory guidance outlined in KCSiE 2023.

### **Recruitment for Suitable People**

The Company and Managers must ensure that all procedures are in place for the safe recruitment and retention of staff and are followed in line with legislation and the Company:

- Safer Recruitment Policy
- Associated Persons Policy and Risk Assessment
- Recruiting Ex- Offenders Policy

All staff with responsibilities for interviewing and recruiting must complete the online Safer Recruitment module and refresh every 2 years. New employees with this responsibility must complete the module as part of their induction programme.

Next steps make sure the Recruitment practices meet the requirements of the recently KCSiE update 2023, including clear practices for:

- Recruitment and selection process (advert, application forms, shortlisting,
- Pre-appointment and vetting checks.
- Recording and checking information including previous jobs, employment history and references, and DBS, disqualification checks.
- Selection for the role, review of skills, interview.
- Other check including overseas and security checks

### **Contractors, visiting guest lecturers/speakers and volunteers**

NextStep Training will in the case of these groups make judgements of risk when offering contracts. The individual making these arrangements is responsible for ensuring that in the case of:

- Contractors: will be supervised or there will be a DBS in place depending on the contractor work
- Visiting Lecturers: Guest speakers may be referred to as visiting lecturers. They will be covered by the External visitor Procedure and supervised by their NextStep Training host.

- Regular guests, where appropriate will be DBS checked and follow NextStep Training's safeguarding policies.
- Volunteers should not be left unaccompanied with Apprentices or apprentices at any time.
- If volunteers are working for NextStep Training and for the purpose of safeguarding, volunteers should be treated as employees and must be DBS checked and a reference obtained.

### **Induction for a new employee**

All staff undergo an induction programme co-ordinated centrally through Human Resources Department. All staff are required to undertake Safeguarding training, Child Protection training, Prevent training and Equality, Diversity and Inclusion training as part of their induction programme. It is the responsibility of the line manager of every new staff member to confirm completion of this training prior to confirming their appointment at the end of their probationary period.

New member of staff will get a tour for the Next step building, will be placed in context with the structure of the company, roles and responsibilities of: SLT (Senior Lead Team) HR (Support, IT, and administration team) and the group of Tutor and teachers' distribution.

### **Training for a new employee**

During Induction the employee will review the job description with Manager or senior member, understanding the responsibilities related to the role. The employee will review and get the online mandatory training and also will review the mandatory policies such Safeguarding, Health and Safety, Whistleblowing, Online data protection, etc.

The Manager or senior member related, will set a CPD to the new employee, establishing date for meet training related to the role or future skills.

### **Reviewing and supporting**

Once the employee gets settled in the role, Manager or Senior member of staff related, will set specific dates to review the probationary period task or goals, stated as 1<sup>st</sup> month, 3<sup>rd</sup> month and 6<sup>th</sup> month.

Once the probationary period ends, the employee will get a confirmation letter to settle the job within Next steps.

If during the probationary period the task or goal stated to the employee by the Manager or senior member related, are not meet, then the probationary period will get extended for 3 moths more.

Once the probationary ends successfully, the employee will get supervision and Appraisal periodically in dates agree with the Manager, or Senior member related. The porpoise of those is to review and track employee performance and practices, review safeguarding issues, identify training needs, and review welfare and wellbeing of the employee.

## **7. If You have Safeguarding concern What should You do?**

Any safeguarding concerns or apprentice/apprentice disclosures should be reported to the DSO/ DSL as soon as possible. If you feel that an apprentice or apprentice is at immediate risk or are unsure you can telephone the DSL on 020 7247 5497 and follow up with the safeguarding report procedure form (physical format to be recorded), submit the safeguarding report form in the first instance to [vanessa@nextsteptrainingltd.co.uk](mailto:vanessa@nextsteptrainingltd.co.uk), if you can not give it face-to-face.

The Child and Vulnerable Adult Protection Policy and Procedures can be found under company documents and website.

## 8. Dealing with Allegations of misconduct against the Staff under Safeguarding and Child Protection

All allegations must be reported to the Designated Safeguarding Lead Vanessa Pinzon or Managing Director as soon as a staff member is aware of an allegation, and follow up with the safeguarding report procedure form or submit the safeguarding report form in the first instance to [vanessa@NextSteptrainingltd.co.uk](mailto:vanessa@NextSteptrainingltd.co.uk).

Next step Training has a legal duty to report concerns within one working day to the Designated Officer of the Local Authority (LADO). The member of staff may be suspended if it is considered that they or anyone else is at risk, or if there is a good reason to believe the continued attendance of the staff member cannot be permitted.

## 9. Allegations of abuse against of members of staff

Staff are required to conduct themselves in an appropriate and professional manner, at all times. Under no circumstances are staff to put themselves in a vulnerable or compromising situation. In the event of an allegation against another member of staff, the procedures for dealing with a disclosure must be followed. In the event of the allegation being made against the designated safeguarding lead, the disclosure must be reported to either a Management Director of the company.

Allegations against a member of staff are linked to the Disciplinary policy and procedures. Apprentices have their own Code of Conduct that is given out at their induction and explained by the tutor, assessor and teachers.

DSL will review the source and kind of allegation to review if that meet the criteria of Low – concern or must be reported to LADO and it review if the concern meets the threshold.

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

In the first instance, the designated safeguarding lead will immediately discuss the allegation with Managing Director. The purpose of an initial discussion is for the DSL and Managing Director to consider the nature (low concern- issue to referral), content and context of the allegation and agree a course of action. The DSL and Managing Director may need to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the DSL or Managing Director will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the DSL should discuss the allegations with Managing Director in order to help determine whether police involvement is necessary.

### **Suspension of staff**

In the event of an allegation being made against a member of staff, that member of staff will be immediately suspended from their duties, pending the results of an investigation. This suspension does not carry any implication of guilt and none should be inferred.

This action will be made in accordance with the company disciplinary procedures and the Colleague Handbook. These procedures will be strictly adhered to during, and after the investigation. Investigations will be carried out by HR.

Abuse of Apprentices, apprentices or staff, is deemed to be 'Gross Misconduct' by NextStep Training and would result in the accused being dismissed, if an appropriate investigation reveals reasonable evidence of abuse.

For further support and guidance, the local LADO should be contacted to provide support and advice on allegations against staff.

## **10. Allegations of abuse made against other Apprentices/ Apprentices (Child-on-child abuse)**

We recognise that Apprentices/apprentices are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up".

Most cases of Apprentices/apprentices hurting other Apprentices/apprentices will be dealt with under our apprentice code of conduct, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put Apprentices/apprentices at risk
- Is violent
- Involves Apprentices/apprentices being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting/ nudes)

**If an apprentice/apprentice makes an allegation of abuse against another apprentice/apprentice:**

We are committed to a whole centre approach to ensure the prevention, early identification, and appropriate management of child-on-child abuse within our Centre and beyond. In cases where child on child abuse is identified we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

Child on child abuse is as any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

**Child on child abuse can take various forms, such as (KCSIE, 2023):**

- Bullying (including cyber-bullying, prejudice based and discriminatory bullying);
- Abuse in intimate and personal relationships between peers;
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence and sexual harassment
- Consensual and non consensual sharing of nudes and semi-nude images and/or videos
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; Upskirting;
- Initiation or hazing type violence and rituals.

All staff, specially tutors and teachers, must be alert to the well-being of Apprentices and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which Apprentices will disclose or present with behaviour(s) as a result of their experiences will differ. Signs that an apprentice may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse:

- failing to attend work, disengaging from learning or struggling to carry out tasks to the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate
- abusive behaviour towards others

If an apprentice is in immediate danger, or at risk of significant harm, a referral to children's social care (if the pupil is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. If a member of staff thinks for whatever reason that an apprentice may be at risk of or experiencing abuse by their peer(s), or that an apprentice may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

If an apprentice speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement.

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the apprentice/all Apprentices affected.

DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL may wish to consult with children's social care and/or any other external agencies to determine the most appropriate response.

**As a part of our safeguarding ethos, we:**

- Seek to be aware of the level and nature of the risk to which any apprentice is, or might be, exposed
- Apply an approach which takes account of safeguarding matters and context
- Take a contextual whole-organisation approach to preventing and responding to child-on-child abuse concerns
- Regard the implementation of this policy as a preventative measure, aiming not simply to react to allegations or incidents of child-on-child abuse
- Recognise the importance of this issue as critical to our Apprentices' welfare, happiness and development, NextStep Training promotes an open culture of reporting such concerns
- Inform the designated safeguarding lead (DSL) and record the allegation, but do not investigate it
- The DSL will contact the local authority designated Safeguarding board and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all involved – both the victim(s) and those against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

**We will minimise the risk of child-on-child abuse by:**

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female Apprentices/apprentices, and initiation or hazing type violence with respect to male Apprentices/apprentices
- Ensuring our curriculum helps to educate Apprentices/apprentices about appropriate behaviour and consent



- Ensuring staff are trained to understand that an apprentices/apprentices harming a peer could be a sign that the individual is being abused themselves, and that this would fall under the scope of this policy

## 11. Whistleblowing

A whistleblower is a worker who is concerned about a wrongdoing and reports this. This will usually be something they have seen at work - though not always. The wrongdoing that is disclosed must be in the public interest. This means it must affect others, e.g. the general public. Whistle blowers are protected by law.

**The following are examples of when it may be appropriate to whistle blow:**

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, e.g. doesn't have the right insurance
- you believe someone is covering up wrongdoing

Personal Grievances are not counted as whistle blowing.

Staff, who suspect malpractice within their workplace or a workplace that they visit, must report their concerns to either the designated safeguarding lead or Managing Director. This is called "whistleblowing".

The Public Interest Disclosure Act came into force in 1999 and gives statutory protection to staff who legitimately makes a disclosure in the public interest which relates to:

- Crime
- Failure to comply with legal obligations
- Miscarriages of justice
- Health & safety threat
- Damage to the environment

Not reporting malpractice is considered misconduct and may lead to disciplinary action.

It is the responsibility of NextStep Training to ensure that any reports are thoroughly investigated and findings recorded.

If the concern is regarding an apprentice, apprentice or their work place, it should be discussed with NextStep Training in the first instance, which could be the assessor and/or designated safeguarding lead or officer and not the workplace manager. If the staff member/apprentice/apprentice who has made the report feels victimised or does not believe that their concerns have been taken seriously, they are encouraged to raise the issue with Managing Director. Any malicious reports that are made by a staff member will lead to disciplinary action. We will also look to refer whistleblowing to local safeguarding board.

Staff should be able to report their concerns to the designated safeguarding lead or officer without fear of repercussions. Each member of staff should know and understand the whistle blowing procedures. All disclosures will be treated in confidence and the whistle blower will be protected by law.

A whistle blower is someone employed by the company who has seen wrongdoing and feels unsafe practices are being followed, putting them or others at risk. When a person is whistle blowing the same procedures will be followed as set out in reporting safeguarding concerns section 8 of the safeguarding policy. If you do not feel this is being handled correctly you can use the complaints or grievance policy with Managing Director.

For advice and guidance on whistle blowing you can use this helpline from the NSPCC Contact the Whistleblowing Advice Line Call 0800 028 0285 or Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 12. Prevent Duty, Radicalization and extremist

### Prevent

At NextStep we follow the Prevent as part of the Government counter-terrorism strategy. We understand and promote with our apprentices and employees that it is about supporting individuals, including young people, who are at risk of radicalization, from becoming involved in terrorism. Support may be provided via the Channel process. This is a multi-agency partnership that evaluates referrals of individuals at risk of being drawn into terrorism, working alongside safeguarding partnerships and crime reduction panels.

PREVENT is part of CONTEST and its aim is to stop people becoming terrorists or supporting terrorism.

**CONTEST has four key principles:**

- 1. PURSUE** – stop terrorist attacks
- 2. PREVENT**– to stop people becoming terrorists or supporting terrorism
- 3. PREPARE** – where we cannot stop an attack, mitigate its impact
- 4. PROTECT**– strengthen overall protection against terrorism attack

In respect of safeguarding individuals from radicalisation, NextStep Training Ltd works to the Prevent element of the Government’s Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the **Channel Programme**. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

On receipt of a concern about radicalisation or extremism, DSL would call 101 and inform the Police who will in turn send the information to the Police Prevent Team, and will get in contact with Channel as well. We will help support individuals who may be vulnerable to radicalisation and where we believe a individual is being directly influenced by extremist materials or influences, we will ensure that the learner is referred to the ‘Channel’ process through direct liaison with the Multi Agency Safeguarding Hub (MASH). In such instances, the Designated Safeguarding Lead will seek external support from the

Local Authority and Prevent Coordinator. If the risk is seen to be serious and dangerous behaviour imminent, the matter will be reported to the police.

## 13. Safeguarding across different locations

NextStep Training delivers training locally and at the apprentice's and apprentice's places of work.

NextStep Training Ltd office is located in London, Hackney Borough. It has easy walking access to the High Street and is on the main bus route and is within walking distance of the two train stations such as London Fields and Hackney Central. Some Apprentices or apprentices will need to attend training venues and some of their training is delivered at their place of work.

**Local threats in the City of London and Metropolitan Police cover these boroughs:**

**Barking and Dagenham – Barnet - Bexley - Brent - Bromley - Camden - Croydon - Ealing - Enfield - Greenwich - Hackney - Hammersmith and Fulham - Haringey - Harrow - Havering - Hillingdon - Hounslow - Islington - Royal Borough of Kensington and Chelsea - Kingston upon Thames – Lambeth - Lewisham - Merton - Newham - Redbridge - Richmond upon Thames - Southwark - Sutton - Tower Hamlets - Waltham Forest - Wandsworth - City of Westminster - Central London (City of London Police)**

**The main areas for concern and issues that are high priority include:**

- Violence to women and girls
- Sexual violence to women and girls
- Sexual exploitation
- Online grooming
- Knife crime
- Gang related crime
- Hate crime
- Human trafficking and modern slavery
- Islamic extremism
- Far right extremism
- Domestic abuse
- Antisocial behaviour
- Drug misuse and related crime

We have identified safeguarding risks and threats for all of these areas using the local police commissioner's priorities and local police projects, alongside information from the local safeguarding children boards and local crime statistics.

### **Visiting places of work: Mobile phones and cameras**

Staff must ensure that all mobile phones and photographic equipment is either surrendered at the main office when visiting an early year setting or left out of sight in their vehicles. Staff are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when Apprentices or apprentices are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with Apprentices or apprentices.

Staff will not take pictures of Apprentices or apprentices on their personal phones or cameras.

We will follow GDPR regulations and Data Protection Act 1998 when taking and storing photos and recordings for use at NextStep Training and will gain the Apprentices and apprentices consent to do so.

## 14. Internet Use

At NextStep Training we embrace new technologies and social media throughout all aspects of our business. This links with our internet, email and social media policies.

We encourage the use of technology in order to enhance skills and promote achievement. Due to the accessibility and the variety of technologies available we need to be aware of potential risks and challenges associated with such use.

This can be achieved through a variety of measures including security, training and guidance and the implementation of our associated policies, such as Safeguarding, Anti-bullying or harassment and Code of Conduct.

All staff should be aware of the company policies about safe practice and usage of the internet and the consequences of their actions if these are not abided by.

All access to websites and use of NextStep Training equipment is monitored by IT department. If trust is abused or inappropriate material has been researched without prior permission such as extremism material or sites disciplinary action will be taken. We will also promote resources for staying safe online or when using the internet.

### **IT /social media policy for Apprentices/apprentices**

We encourage all Apprentices/apprentices to engage with social media and IT as part of their qualification. We encourage all Apprentices/apprentices to research information to support the development of their knowledge and understanding for good practice, legislation and policies. Apprentices and apprentices are encouraged to use websites, Facebook, Pinterest, linked-in and Instagram. All our systems such as the emails, website, Facebook and Linked-in are all monitored for the published content.

All our assessor/ tutors will support their Apprentices or apprentices with safe websites to carry out the research. All materials would be checked before to ensure that the information required for their qualification is available on those sites, as this will help guide the Apprentices/apprentices to the best or most appropriate information.

Any offensive comments by Apprentices or apprentices will be investigated. The posts will be removed immediately as we operate zero tolerance and this could jeopardise the Apprentices or apprentices place on the course. If an apprentice or apprentice views offensive posts or material on our website or in any of the recommended resources or information they must report this to their assessor or the designated safeguarding lead/officer immediately for it to be removed.

We operate an e-portfolio system that is monitored and supported by an outside agency. All emails, text messages, or contact through the website is monitored by IT department.

All emails and text messages to assessors through the electric portfolio are monitored and any offensive or abusive messages will be removed and investigated. As we operate zero tolerance this could jeopardise the Apprentices or apprentices place on the course.

All our systems carry virus and security checkers.

All Apprentices/apprentices are encouraged to learn how to keep themselves safe online. This is done through our review process where we cover topics including cyber security, virus checking and how to identify secure websites. We also look at this in some of the units in their qualifications.

## 15. Lone Working

Office staff may be required to spend periods of time alone in the office, in these events, staff should take all necessary precautions to keep themselves safe including:

- Locking all doors and windows - being mindful of an emergency escape route in case of fire etc.
- Having all appropriate emergency contact numbers and a telephone to hand.
- If walking alone, to or from a vehicle, ensuring that the vehicle is parked in a well-lit area that is as close as possible.

**NextStep Training in turn will participate by:**

- Minimising the occurrence of lone working
- Providing panic alarms for general use if desired.

**Mobile/field staff** are expected to keep regular contact by phone with the head office / local office and must be contactable during working hours. All electronic shared diaries must be up to date and the location must be clearly identifiable.

If an employee knows they will not be contactable for a period of time, such as their being no signal on their mobile phone, as a result of working in an isolated area, they should pre-warn their line manager of the expected duration of this and if any necessary special arrangement should be made. These may include utilising the workplace land telephone line.

Employees should also advise on-site staff of their whereabouts at all times, particularly when meeting new employers, Apprentices or customers.

If you are visiting a workplace at night or in a dangerous area, please telephone your line manager to inform them that you will be travelling to this place, notify them of your arrival and when you have safely arrived either back at head office or home if you are a remote worker.

### Using Public Transport

When using public transport please be aware of the people around and your environment. If at any time you do not feel safe, leave the area and find somewhere safe to contact head office. Please ensure that you have planned your journey, keep to populated and well-lit

areas. If you have to wait for buses or trains wait in lit areas and where possible with others so that you are not on your own. Please ensure that your oyster and/or fares are ready and that you are not trying to find cash whilst waiting as this could make you vulnerable. Please keep all your possessions hidden and carefully stored so as not to draw attention to yourself. If you must use your mobile keep this close with a firm grip and find a secure place to use it.

When walking please keep to lit areas, and plan your route before starting your journey. If you are using your car, please ensure that you park in well-lit areas of a car park or on street areas. Be aware of your environment when getting out of the car or returning to it. Think about your personal belonging when getting in or out of the car.

## 16. Additional Safeguarding Measures of NextStep Training Ltd

Apprentices and Apprentices with criminal convictions are risk assessed prior to starting the course. External speakers are risk assessed by the invitees and a log is held to ensure staffs at NextStep Training are aware who is on site.

## Appendix One

### KCSiE September 2022, Annex B

As outlined in part one of KCSiE, where staff have a concern about an apprentice's/apprentice's/child's welfare, they should act immediately. They should follow the policy on Child and Vulnerable Adult Protection Policy and Procedures and speak to a DSL.

Specific forms of abuse outlined in Annex B. refer to Annex B for further information.

#### List of abuse/safeguarding issues:

- Children and the Court System
- Children missing from education
- Children with family members in prison
- Child sexual exploitation (CSE)
- Child criminal exploitation (County lines)
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence Preventing radicalisation
- Child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges

#### Additional advice and support

Within Annex B there is a list of abuse/safeguarding issues with links to the relevant guidance and advice. These include:

- Abuse: Child abuse, Faith Abuse, Relationship abuse, Domestic abuse
- Bullying and Cyber bullying
- Children in the Courts: Advice for 12-17 year olds
- Children missing: Missing from care, home or education
- Children with family members in prison:
- Child Exploitation: county Lines, child sexual exploitation (CSE) and trafficking
- Drugs
- Health and wellbeing: Fabricated or Induced Illness, Mental health

- Homelessness
- On-line: Sexing
- Private Fostering
- Radicalisation: Prevent Duty and Hate
- So-called 'Honour Based Violence': Female Genital Mutilation, Forced marriage
- Violence: Gangs and youth violence, Gender Based Violence Against Women, Sexual violence and sexual harassment (Child on child abuse)

## Definitions of Abuse

Abuse is a form of maltreatment of a child and there are a number of categories of abuse which include neglect or acts of omission, physical abuse, sexual abuse, domestic abuse, psychological or emotional abuse, financial or material abuse as well as modern slavery, discriminatory abuse, organisational abuse. Abuse can also take place wholly online or via technology.

**Physical abuse** - is defined as the use of physical force that may result in bodily injury, physical pain, or impairment such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also include a parent or carer fabricating or deliberately causing the symptoms of illness in a child. **Remember, if you have any concerns, you MUST report these to the DSL or deputy safeguarding lead immediately. It is better to check if you are not sure, than not do anything.**

**The impact of physical abuse** - Physical abuse can lead directly to brain damage, physical injuries, pain and disability or, at the extreme, death. Harm may be caused to a child, young person and vulnerable person both by the abuse taking place in a wider family or institutional context of conflict and aggression. Physical abuse has been linked to aggressive behaviour, emotional and behavioural problems and educational difficulties.

Where a child, young person is disabled, injuries or behavioural symptoms may be attributed to his/her disability rather than the abuse. Professionals must guard against attributing the possible indicators of abuse to racial, cultural or religious stereotypes.

**Sexual abuse** - consists of forcing or encouraging a minor to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or young person is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts, such as masturbation, kissing, rubbing and touching the outside of clothing. Also included are non-contact activities involving children looking at, or being involved in the production of, sexual images, watching sexual activities, sexually inappropriate behaviour or grooming a child. Sexual abuse can take place online or via other forms of technology. Perpetrators are not only adult males but can include women and other children (also known as child-on-child abuse).

**The impact of sexual abuse** - Disturbed behaviour, including self-harm, inappropriate sexualised behaviour, sadness, depression, and a loss of self-esteem, have all been linked to sexual abuse. In disabled children, these behaviours have sometimes mistakenly been linked to the child's disability without any real assessment of their cause. The effects of sexual abuse will continue throughout childhood and remain into adulthood. They can adversely affect an adult's ability to trust others and form secure relationships.

**Psychological** - Emotional or psychological abuse is defined as the infliction of anguish, pain, or distress through verbal or nonverbal acts.

**Neglect** – is regularly failing to meet a child's basic, physical and/or psychological needs, including during pregnancy (substance abuse, dangerous behaviour). It may involve, but is not limited to, a parent or carer failing to provide adequate food, clothing and shelter, failing to protect a child from

harm (physical and emotional) or danger, failing to ensure adequate supervision (including the use of inadequate care-givers) and failing to nurture their emotional needs, ensuring access to appropriate medical care or treatment. **The indicators of neglect are listed in Appendix 1.**

**The impact of neglect** – severe neglect of young children is associated with major impairment of growth and intellectual development. Persistent neglect can lead to serious impairment of health and development and long-term difficulties with social functioning, relationships and educational progress. Neglect can also result, in extreme cases, in death. **The list is not exhaustive, and you may have other concerns that are not listed in Appendix 1.**

**Financial abuse** – in intimate relationships is a way of controlling a person’s ability to acquire, use, and maintain their own money and financial resources.

**Emotional abuse** - is the persistent, emotional maltreatment of a child, to cause severe and adverse effects on the child’s emotional development. Emotional abuse involves making a child feel that they are worthless or unloved, inadequate, or that they exist only to meet the needs of another person. It may include suppressing their views, deliberately silencing them or mocking them. It may include imposing age or developmentally inappropriate expectations upon children, such as interactions beyond a child’s developmental capability. Emotional abuse can include overprotection, limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing abuse, serious bullying (including cyber-bullying), instilling fear in children or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. **The list is not exhaustive, and you may have other concerns that are not listed. So, if you have any concerns, please report them immediately to the DSL.**

**The impact of emotional abuse** – there is increasing evidence of the adverse of long-term consequences for children’s development where they have been subject to sustained emotional abuse. Emotional abuse has an important impact on a developing child’s and young adult’s mental health, behaviour, and self-esteem. It can be especially damaging in infancy. Underlying emotional abuse may be as harmful, if not more so, than other more visible forms of abuse in terms of its impact on the child. In families where the child experiences a low-level of emotional warmth and a high-level of criticism, negative incidents may have a more damaging impact on the child. Domestic abuse, adult mental health problems, substance misuse or racism from a caregiver may feature in families where children are exposed to emotional abuse.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Sexual exploitation is a type of sexual abuse. It can include physical contact, such as assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It can include non-contact activities, for example, the involvement of children in producing sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in a sexually inappropriate way, or grooming a child in preparation for abuse including via the internet.

CSE may be a one-off occurrence or it may happen over time. It may also happen without the child’s immediate knowledge; for example, the sharing of videos or images of them on social media by others. Children aged 16-17 years old, who can legally consent to have sex, can still be affected by CSE. They may be coerced into sexual activities and not realise they are being exploited; for example, they may believe they are in a genuine, romantic relationship.

Sexual Exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people and victims can be male or female. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child’s physical and emotional health. It may also be



linked to child trafficking. All staff is made aware of the indicators of sexual exploitation and all concerns are reported immediately to the Safeguarding Officer.

Sexual Exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **Female Genital Mutilation (FGM)**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non- medical reasons.

Professionals in all agencies and individuals and groups in relevant communities must be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young woman may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young woman. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals must note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff must activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care (Under 18's).

Adults: There is *no* requirement for automatic referral of adult women with FGM to adult social services or the police. Professionals should be aware that any disclosure may be the first time that a woman has ever discussed her FGM with anyone. Referral to the police must not be introduced as an automatic response when identifying adult women with FGM, and each case must continue to be individually assessed. The professional should seek to support women by offering referral to community groups who can provide support, and clinical intervention or other services as appropriate, for example through an NHS FGM clinic. The wishes of the woman must be respected at all times. If she is pregnant, the welfare of her unborn child or others in her extended family must be considered at this point, as these children are potentially at risk and safeguarding action must be taken accordingly.

All staff must complete FGM online training as below:

<https://www.virtual-college.co.uk/resources/free-courses/recognising-and-preventing-fgm>

### **Spirit Possession or Witchcraft**

Where parents, families and the child themselves believe that an evil force has entered a child and is controlling them, the belief includes the child being able to use the evil force to harm others. This evil is variously known as black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah. Children are called witches or sorcerers.

Parents can be initiated into and / or supported in the belief that their child is possessed by an evil spirit by a privately contacted spiritualist / indigenous healer or by a local community faith leader. The task of exorcism or deliverance is often undertaken by a faith leader, or by the parents or other family members.

A child may suffer emotional abuse if they are labelled and treated as being possessed with an evil spirit. In addition, significant harm to a child may occur when an attempt is made to 'exorcise' or 'deliver' the evil spirit from the child.

Significant harm is defined as a situation where a child is suffering, or is likely to suffer, a degree of physical, sexual and / or emotional harm (through abuse or neglect) which is so harmful that there

needs to be compulsory intervention by child protection agencies into the life of the child and their family.

### **Faith Abuse**

Child abuse linked to 'Faith or Belief' is often connected to the concept of belief in:

- Witchcraft and spirit possession, demons or the devil acting through children leading them astray (traditionally seen in Christian beliefs)
- The evil eye or dijins (traditionally known in some Islamic faith contexts) and dakini (in the Hindu and Buddhism context)
- Ritual or muti murders where the killing of children is believed to bring supernatural benefits; or the use of their body parts is believed to produce potent magical remedies
- Using the belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

**This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune.**

For more information, please see link below:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/175437/Action Plan - Abuse linked to Faith or Belief.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action_Plan_-_Abuse_linked_to_Faith_or_Belief.pdf)

**County Lines and Cuckooing** - The 2018 Home Office Serious Crime Strategy states the NPCC definition of a County Line is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. For support or concerns regarding County Lines, please discuss with your DSL.

**Concerns can be reported to your local police by dialling 101, or in an emergency 999.**

If you would rather remain anonymous, you can contact Crimestoppers on 0800 555 111.

**Cuckooing** is the practice of taking over the home of a vulnerable person in order to establish a base for illegal drug dealing, typically as part of a county lines operation.

### **Signs that cuckooing is taking place at a home are:**

- An increase in people entering and leaving
- An increase in cars or bikes outside
- Possible increase in anti-social behaviour
- Increasing litter outside
- Signs of drugs use
- Lack of healthcare visitors
- People coming and going at strange times
- Damage to the door/the door propped open
- Unknown people pressing buzzers to gain access to the building
- You haven't seen the person who lives there recently or, when you have, they have been anxious or distracted.

### **Mental Health**

NextStep Training Ltd recognises that mental health is as important to a child's and adult's safety and wellbeing as their physical health. It can impact on all aspects of their life, including their educational attainment, relationships and physical wellbeing. Mental health can also change over time, to varying

degrees of seriousness, and for different reasons. Therefore, anyone who works with children and young people has a responsibility to promote their mental health and emotional wellbeing. This can include:

- helping with online wellbeing
- encouraging exercise
- maintaining routines.

Any mental health concerns that are also safeguarding concerns should be reported to the Designated Safeguarding Lead, following the centre's child protection policy.

There are ways staff can identify if a child needs support with their mental health. By being attentive to a child or young person's mood and behaviour, staff can recognise patterns that suggest they need support.

**Common warning signs of mental health issues include:**

- sudden mood and behaviour changes
- self-harming
- unexplained physical changes, such as weight loss or gain
- sudden poor academic behaviour or performance
- sleeping problems
- changes in social habits, such as withdrawal or avoidance of friends and family.

These signs suggest that a child may be struggling, but there could be a number of different explanations for them. However, diagnosis of mental health problems should only be made by trained professionals.

**Honour Based Abuse**

**Honour based abuse includes:**

- Forced marriages
- FGM (see previous page)
- Honour killings
- Procedures such as breast flattening/ironing : This is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.

<http://nationalfgmcentre.org.uk/breast-flattening/>

All forms of honour based abuse must be reported in line with the company safeguarding procedures.

**Extremism and Radicalisation**

The duty to protect young people and vulnerable adults from harm extends to protecting them from involvement in groups which set out to radicalise individuals. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Universities and Further Education institutes have been identified within the government's Prevent Strategy as potential sites for radicalisation.

Factors which are considered when determining whether an individual may be vulnerable to involvement with terrorism are broadly described as:

- Engagement with a group, cause or ideology;
- Intent to cause harm;
- Capability to cause harm.

Staff or Apprentices may be concerned about someone due to changes in behaviour or appearance. For example:

- An individual may stop contact with peers and only be interested in contact with members of a particular ideological group;
- An individual may change their habitual style of dress;
- An individual may condone violence in support of their espoused ideology.
- There may be many reasons for such changes which are why a safeguarding approach should be adopted as this enables relevant services within and outside NextStep Training Ltd to identify an individual's needs and vulnerabilities. This includes deciding whether the Channel Process may be of benefit to the individual.

If a member of staff is concerned that an individual may be becoming radicalised s/he should speak to his/her line manager who should contact the Safeguarding Officer.

If an apprentice is concerned that an individual may be becoming radicalised s/he should discuss this with the senior member of staff who will implement and follow the procedures as detailed.

### **Forced Marriage**

This term is used to describe a marriage in which one or both of the parties are married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

### **Bullying and Cyber bullying**

All parties within NextStep Training Ltd agree with the Government definition of bullying as:

'Behaviour by an individual or group usually repeated over time, that intentionally hurts another individual or group either physically or emotionally'.

We also find helpful the following clarification by the Anti-Bullying Alliance, which states that bullying mostly falls into two categories:

- emotionally harmful behaviour, such as taunting, spreading hurtful rumours and excluding people from groups; and physically harmful behaviour, such as kicking, hitting, pushing, or other forms of physical abuse.

The following three conditions are used to define incidences of harmful interpersonal behaviour as bullying behaviour. Behaviour is bullying behaviour if:

- it is repetitive, wilful or persistent;
- it is intentionally harmful, carried out by an individual or group; and,
- there is an imbalance of power leaving the person who is bullied feeling defenceless.

"Cyber-bullying" is when a child or young person, threatened, harassed, humiliated, embarrassed or otherwise targeted by another child or young person using the Internet, interactive and digital technologies or mobile phones. It has to have a minor on both sides, or at least have been instigated by a minor against another minor. Once adults become involved, it is plain and simple cyber-harassment or cyber stalking. Adult cyber-harassment or cyber stalking is NEVER called cyber-bullying. ([www.stopcyberbullying.org](http://www.stopcyberbullying.org))

### **Domestic abuse**

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

### **The Trio of Vulnerabilities (also known as toxic trio)**

The issues of domestic abuse, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred. They are viewed as indicators of increased risk of harm to children and young people.

## Appendix two

### Regional Safeguarding and Prevent Regional Risks

Prevent is part of the Government counter-terrorism strategy. It is about supporting individuals, including young people, who are at risk of radicalisation, from becoming involved in terrorism. Support may be provided via the Channel process. This is a multi-agency partnership that evaluates referrals of individuals at risk of being drawn into terrorism, working alongside safeguarding partnerships and crime reduction panels.

PREVENT is part of CONTEST and its aim is to stop people becoming terrorists or supporting terrorism.

**CONTEST has four key principles:**

1. **PURSUE** – stop terrorist attacks
2. **PREVENT**– to stop people becoming terrorists or supporting terrorism
3. **PREPARE** – where we cannot stop an attack, mitigate its impact
4. **PROTECT**– strengthen overall protection against terrorism attack

In respect of safeguarding individuals from radicalisation, NextStep Training Ltd works to the Prevent element of the Government’s Counter Terrorism Strategy, and where deemed appropriate seeks external support for Apprentices through referrals to the **Channel Programme**. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

On receipt of a concern about radicalisation or extremism, DSL would call 101 and inform the Police who will in turn send the information to the Police Prevent Team. We will help support individuals who may be vulnerable to radicalisation and where we believe an individual is being directly influenced by extremist materials or influences, we will ensure that the apprentice is referred to the ‘Channel’ process through direct liaison with the Multi Agency Safeguarding Hub (MASH). In such instances, the Designated Safeguarding Lead will seek external support from the Local Authority and Prevent Coordinator. If the risk is seen to be serious and dangerous behaviour imminent, the matter will be reported to the police.

We have identified safeguarding risks and threats for all of these areas using the local police commissioner’s priorities and local police projects, alongside information from the local safeguarding partnerships and local crime statistics. Crime statistics show a high risk of Violence and Sexual Offences. This is closely followed in all areas by Anti-Social Behaviour.

Looking into Violence and Sexual Offences, the Police identify the following under this category:

**Violence:**

- Minor assaults (such as pushing and shoving)
- Harassment and abuse (that result in no physical harm) through to wounding and homicide

**Sexual offences:**

- Rape
- Sexual assault and unlawful sexual activity against adults and children

- Sexual grooming
- Indecent exposure.

#### **Violence and Sexual Offences:**

Apprentices and apprentices are made aware of all risks in their demographic region. They are reminded at every progress review by their assessor and a discussion takes place each time as a standard part of the review. Apprentices and apprentices are actively involved in research surrounding safeguarding themselves, colleagues and children and are routinely asked how they are keeping themselves and others safe. They undertake extensive training on safeguarding adults and children so that they have a complex understanding of what violence and sexual offences are and how to stay safe and ensure that others are also kept safe. They are reminded of different situations which can make them vulnerable such as walking alone at night, joining large public crowds, using public transport late at night all the way through to meeting with people met through the internet, being aware of who they are conversing with online and using privacy settings on social media accounts.

#### **Looking into Anti-Social Behaviour, the Police identify the following under this category:**

- Nuisance, rowdy or inconsiderate neighbours
- Vandalism, graffiti and fly-posting
- Street drinking
- Environmental damage including littering, dumping of rubbish and abandonment of cars
- Prostitution related activity
- Begging and vagrancy
- Fireworks misuse
- Inconsiderate or inappropriate use of vehicles

Apprentices and apprentices are made aware of all risks in their demographic region. They are championed as being role models to children and parents and therefore, as part of their employability training, are actively encouraged to continue this behaviour outside of their working hours.

Each apprentice and apprentice is taught about British Values, in depth, and this contributes to them being aware of citizenship and how to make a difference in the community. This informs them of what is and what not acceptable behaviour is. Again, progress reviews are the optimal time for them to be reminded by their assessor as they talk about how they have improved their own employability skills as well as discussing their own personal development and welfare.

#### **Prevent Risks**

Apprentices, apprentices and staff are aware of the Run, Hide and Tell government agenda through the critical incident training. Staff, Apprentices and apprentices have received training on the Prevent agenda.

#### **County Priorities**

These are used to educate staff, Apprentices and apprentices and help to inform programme delivery and provide localised knowledge and understanding to support the apprentice or apprentice.

## **Appendix three**

### **Response to COVID-19**

There have been many changes for Apprentices and within settings in response to the outbreak. All Apprentices are now learning at home and staffing in settings is likely to be affected through illness and self-isolation.

Despite the changes, our Safeguarding Policy is fundamentally the same: the safety of our Apprentices always come first, staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedure.

### **Reporting arrangements**

Concerns continue to be reported through the normal channels. Staff will continue to follow the Safeguarding procedure and advise the safeguarding leads immediately about concerns they have about any apprentice, whether in training or not. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards. Where an apprentice is expected and does not arrive for a planned session the delivery team should make contact with the apprentice. If contact is not possible then the employer must be informed. The Training Delivery team will attempt a range of methods to contact the apprentice/employer (Skype, Call, Email, Emergency Contact etc). The challenges of COVID-19 do not override the duty on NextStep Training to ensure Apprentices are safe.

### **Staff will be aware of increased risk**

The pressures on Apprentices and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. These areas should be considered in the setting of any work for Apprentices to undertake at home (including recognising the impact of online learning – see below). Staff will be aware of the mental health of Apprentices, informing the DSL about any concerns.

### **Risk online**

Apprentices will be using the internet more during this period as we use online approaches to deliver training or support. Staff will be aware of the signs and signals of risks online and apply the same safeguarding practices as when learning in setting.

NextStep Training Ltd will follow guidance for safe remote learning. Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the expectations for professional conduct and the importance of using NextStep Training Ltd systems to communicate with Apprentices. Staff are aware of safeguarding considerations for livestreaming prior to delivering any livestreamed sessions (backgrounds, appearance etc). Apprentices and Employers have received information about keeping safe online through communication campaigns in Emails. Additional resource to support Remote Learning, Mental Health and Wellbeing and Covid-19 updates have been regularly updated on the NextStep Training website.

Free additional support for staff in responding to online safety issues can be accessed from the UK Safer Internet Centre. <https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline> [Page 24](#)